

O WORLD-WIDE



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FCC SECRETARY

Magalie Roman Salas

Office of the Secretary

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Federal Communications Commission

1919 "M" Street NW - Room 222

Washington, D.C. 20554

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Re: In the matter of 1998 Biennial Regulatory Review - Amendment
of Part 97 of the Commission's Amateur Service Rules
FCC WT Docket # 98-143

Dear Magalie, (and to Whom it may Concern).

- I am an Extra Class amateur radio operator (ie. W8CK), having been first licensed in 1955 as a "novice", and having also held the classifications of technician, general, advanced, and extra class.
- I also am an active accredited Extra Class ARRL VE Examiner, assisting in the administration of 12-13 VE Examination Sessions to more than 150 applicants every year.
- I want to say that I am basically in agreement with the 3 FCC proposals in paragraph 3 of your EXECUTIVE SUMMARY as being both proper and timely (re: phasing out novice and tech plus, Advanced operator authorization, and sunsetting RACES licenses). These 3 areas are a very good beginning for needed improvements.
- I do have some comments which I believe do follow the expressed desires of both the FCC and the amateur radio community - that is - to provide motivation for amateur operators to advance their communication and technical skills and also to help to simplify and clarify execution of the test procedures and examinations given. An

added benefit, I believe, would be more uniformity and consistency between the several VEC organizations, and their different tests administered nationwide.

- My comments (items 1 thru 5) and a request (item 6) include the following -

1.) Change the class name to "BASIC" for the new entry level classification, which would parallel CANADA's entry classification name, and I believe would be more proper and designatory than any of the current "NOVICE" or "TECHNICIAN" or "TECH PLUS" nomenclatures

Reasoning - I know that I personally and certainly would have preferred the name "BASIC" amateur operator as a more appropriate title, to either "NOVICE" or "TECHNICIAN" both of which I previously held. The word "novice" in it-self can have a slightly degrading connotation by its own nature - and - "technician" really is not technically correct either for the vast majority of amateur applicants. Most of us gain our technical abilities with time and experience in the amateur community, and as such, are not "technicians" when we begin. This would be a perfect juncture to use a new, meaningful and appropriate name for the new entry level classification.

2.) Have no code requirement for "BASIC", and code speeds of 8, 13, and 18 WPM for GENERAL, ADVANCED, and EXTRA classes. Existing NOVICE AND TECH PLUS Operators would continue "grandfathered" and could have code

privileges on other bands (15 and 10 meters) as you suggest (in your paragraph 12), to help them increase their code abilities to sooner attain 8WPM (or better) for their GENERAL HF Privileges.

Reasoning - "No code" would bring more applicants into the "BASIC" class as learners. 8WPM for GENERAL class would move more licensees up quicker to HF privileges. 13 WPM for ADVANCED would differentiate that classification better, and make it more meaningful in the future. Currently, memorization of theory only can provide a quick and easy new classification for many, with very little extra effort. 18WPM for EXTRA would be a good high speed, hand copyable, plateau, with much extra daily learning practice already being provided, as all ARRL-WIAW Code bulletins are automatically sent at 18WPM, four separate hours of every day, in addition to all the normal practice sessions.

- 2a) As an alternative to 2) above I would also suggest 0, 5, 10, and 15 WPM could be substituted for the 0, 8, 13 and 18 WPM as stated above, for the 4 classifications. This could be considered if they would be more appropriate and more universally accepted in the opinions you get from the majority of the amateur radio community. I, personally, don't believe any of the above Morse speed changes would degrade amateur radio as a public service and would be welcome.

3.) Change all Code Test Element grading to Multiple choice type questions only (same as in theory element testing) for all VEC's nationwide, for uniformity and ease of examination grading , and subsequent uniformity of applicant abilities . For starters, I would suggest 16-20 multiple choice questions for any of the 3 code tests, with 12-15 Correct Minimum (4-5 Maximum incorrect) - 75% passing, as a reasonable test of code comprehension ability.

Reasoning : Added questions would tend to make the easier multiple choice mode somewhat more difficult and would also compensate for the non-necessity to have 1 minute (or any-time) of perfect copy, which has always taken much more time to administer. This method is currently being used (with less - only 10 questions) by some VEC's (WS4I and etc), making their code elements easier to attain than those of some of the other VEC's (ARRL and etc). I understand that this has been at the discretion of individual VEC's, but it does result in non-uniformity of test grading and, in turn, inequality between applicants and licensee's nationwide. This method would also tend to speed up VE's correction time for code testing drastically, and would even help to simplify code testing and grading for persons with disabilities (your paragraph 25) and further help to minimize undue burdens on their abilities .

4.) Expand and/or change all theory exam elements to an equal number of questions (ie - 50 questions, or 60, or 70 etc whatever is appropriate, with 75% or over a passing grade.

Reasoning : To further simplify VE test administration and to eliminate the confusion factors that result in a test session, when grading many examinations for 2,3, or 4 classifications, and the resulting differences in minimum correct answers for each theory element given and subsequently checked. This would also allow the FCC room to mandate additional questions in certain areas, and/or added questions covering some of the digital and other new technology areas (per your paragraph 27.)

5.) Change the designation nomenclature for all test elements, at this appropriate change juncture - as follows -

	Code Element (C = Code)	Theory Element (T = Theory)
1	BASIC — none —	1T
2	GENERAL 8WPM (or 5WPM)	2C 2T
3	ADVANCED 13WPM (or 10WPM)	3C 3T
4	EXTRA 18WPM (or 15WPM)	4C 4T

Reasoning : For ease of VE administration and ease of recognition of elements during test sessions and during the grading procedures. This would eliminate all the present confusion factors during test sessions resulting from the current element designations (ie 1A, 2, 1B, 3A, 3B, 4A, 1C, 4B etc), which will no longer be necessary with only 1 code and/or 1 theory element for each classification.

6.) A somewhat unrelated request, but appropriate to bring up while changes are being considered, having to do only with a minor subband designation. Extend the lower end of the 20M phone/SSB Subband down to 14.125 MHz (vs. the current 14.150 MHz) for Amateur Extra Class Operators.

Reasoning: Many worldwide operators including Canadian operators and others utilize this subband in the phone/SSB mode, and, in my constant listening and experience, no other modes (CW, RTTY, etc as currently designated) are used in this segment. This would allow us as U.S. Extra Class Amateurs to communicate with other worldwide amateurs who are now using this small Subband Segment on 20M for phone/SSB Communications.

- FCC, my full and only intent in voicing the above 6 comments and requests, as an active and concerned amateur and volunteer examiner, is for the simplification and standardization of the proposed element designations, examinations, and test procedures without either complicating and/or "watering down" substantially, any of them. The net result should, and would, be retention of the integrity of the entire amateur radio licensing procedure - a goal I believe the FCC and most amateurs would desire.
- Regarding other questions that have arisen, either in your docket or in the ARRL proposals, I am in full agreement with the needs to gain more integrity in medical certification waivers above 5 WPM, and, also, the needs to provide

better enforcement against abuses of amateur privileges, but I, personally, have no "quick fix" solutions or answers. I hope yourselves, as the FCC, and/or others will assist to help set up procedures to alleviate these problems too.

- Thank you for your considerations of not only my comments and opinions and requests, but also for those of other seriously interested and concerned amateurs as well. The net results will, I am sure, be of benefit to all, and a distinct improvement to the entire amateur community.

Sincerely

Craig S. Kidder

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